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8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the First Amended Accusation
11 Against:

Case No. 2011-999

12 **PAUL STEVEN JUAN**
13 **15533 Ermanita Avenue**
Gardena, CA 90249
14 **Registered Nurse License No. 724472**

FIRST AMENDED ACCUSATION

15 Respondent.

16
17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this First Amended Accusation
20 solely in her official capacity as the Executive Officer of the Board of Registered Nursing
21 (Board), Department of Consumer Affairs.

22 2. On or about April 9, 2008, the Board issued Registered Nurse License Number
23 724472 to Paul Steven Juan (Respondent). The Registered Nurse License was in full force and
24 effect at all times relevant to the charges brought herein and will expire on December 31, 2011,
25 unless renewed.

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1 “(a) Assaultive or abusive conduct including, but not limited to, those violations listed in
2 subdivision (d) of Penal Code Section 11160.

3 “(b) Failure to comply with any mandatory reporting requirements.

4 “(c) Theft, dishonesty, fraud, or deceit.

5 “(d) Any conviction or act subject to an order of registration pursuant to Section 290 of the
6 Penal Code.”

7 9. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
8 administrative law judge to direct a licensee found to have committed a violation or violations of
9 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
10 enforcement of the case.

11 **CAUSE FOR DISCIPLINE**

12 **(Substantially-Related Conviction)**

13 10. Respondent is subject to disciplinary action under Code sections 490 and 2761,
14 subdivision (f), in conjunction with California Code of Regulations, title 16, section 1444, in that
15 he was convicted of a crime substantially related to the qualifications, functions, and duties of a
16 registered nurse. The circumstances are as follows:

- 17 a. On or about March 30, 2011, in criminal proceeding entitled *People of the State of*
18 *California vs. Paul Steven Juan*, in the Los Angeles Superior Court, Case Number
19 YA077923, pursuant to his plea of nolo contendere, Respondent was convicted of one
20 count of violating Penal Code section 261.5(D) – attempted unlawful sexual intercourse
21 with a minor by an adult, a misdemeanor. Respondent was sentenced to 60 days in jail,
22 placed on three-year summary probation, ordered to perform 120 days of community
23 service, and 52 weeks of sex counseling, among others. The circumstances surrounding
24 the conviction are that on or about April 29, 2010, Respondent was arrested by the
25 police when he arrived at a fast food restaurant to meet a fourteen year-old female he
26 had met on-line with the intent to commit a sexual offense.

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1 PRAYER

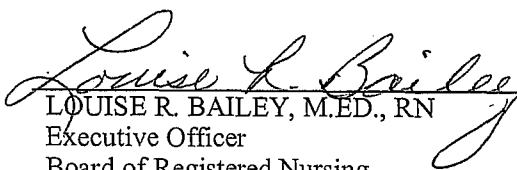
2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
3 and that following the hearing, the Board of Registered Nursing issue a decision:

4 1. Revoking or suspending Registered Nurse License Number 724472, issued to Paul
5 Steven Juan;

6 2. Ordering Paul Steven Juan to pay the Board of Registered Nursing the reasonable
7 costs of the investigation and enforcement of this case, pursuant to Business and Professions
8 Code section 125.3;

9 3. Taking such other and further action as deemed necessary and proper.
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12 DATED: June 30, 2011


13 LOUISE R. BAILEY, M.Ed., RN
14 Executive Officer
15 Board of Registered Nursing
16 Department of Consumer Affairs
17 State of California
18 Complainant

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